



MEMO ENDORSED

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

October 11, 2022

By ECF

The Honorable Kenneth M. Karas
United States District Judge
United States Courthouse
300 Quarropas St.
White Plains, NY 10601

Re: *United States of America v. Phillip Liu, et al.*, No. 22 Civ. 5776 (KMK)

Dear Judge Karas:

This Office represents plaintiff the United States of America (the "Government") in the above-referenced matter, which seeks to reduce to judgement the outstanding federal unpaid tax liability of defendant Phillip Liu and foreclose on an apartment he owns with his wife, defendant Ellen Chan-Liu. I write on behalf of all parties to respectfully request (1) an adjournment of the initial conference scheduled for October 18, 2022, *see* Dkt. No. 24, by at least 30 days and (2) a 30-day extension of the Government's time to answer, move, or otherwise respond to the counterclaim brought by defendants Citimortgage Inc. and Cenlar FSB (the "counterclaim"), from October 18, 2022 to November 17, 2022.

The parties continue to believe they may be able to resolve this matter without litigation in the near future and request additional time to explore that possibility before setting a schedule for any discovery and dispositive motions. This is the parties' second request for an adjournment of the initial conference, and the Court granted the first request. It is the Government's first request for an extension of time to respond to the counterclaim.

We thank the Court for its consideration of this request.

Granted. The conference is adjourned to 11/22/22,
at 10:30

So Ordered.

10/11/22

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/ Mollie Kornreich
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cc: Counsel of Record (by ECF)